

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,
45th President of the United States of
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New
York corporation, ROBERT
WOODWARD p.k.a. BOB
WOODWARD, an individual, and
PARAMOUNT GLOBAL, a Delaware
corporation f/k/a VIACOMCBS, INC., a
Delaware corporation, f/k/a Viacom Inc.,
successor by merger to CBSCorporation,
a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,

Defendants.

Civil Action Number:
3:23-cv-02333-RV-ZCB

**MOTION FOR ADMISSION
*PRO HAC VICE***

Pursuant to Local Rule 11.1(C), Defendants Bob Woodward, Simon & Schuster, Inc., and Paramount Global move for the admission *pro hac vice* of John M. Browning, a licensed member of the New York Bar. Mr. Browning has undertaken the representation of Defendants in this matter as counsel. In support of this motion, Defendants state as follows:

1. John M. Browning resides in New York.

2. Mr. Browning is licensed to practice law in New York and is a member in good standing of the New York Bar. A true and correct copy of Mr. Browning's Certificate of Good Standing from the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department is attached hereto as Exhibit A.

3. Mr. Browning is an associate at the law firm Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, NY 10020.

4. Davis Wright Tremaine was retained by Defendants to provide legal representation in connection to the above-captioned action before this Court. Should the Court grant this motion, he and Davis Wright Tremaine will represent Defendants as co-counsel in this case with Joseph Jacquot from the law firm, Gunster, Yoakley & Stewart, P.A., One Independent Dr., Suite 2300, Jacksonville, FL 32202.

5. Mr. Browning is not a member of The Florida Bar and does not maintain any law office in Florida.

6. Mr. Browning studied and is familiar with the Local Rules of this District. He further certifies he successfully completed the Attorney Admission Tutorial for the Northern District of Florida and has reviewed the CM/ECF Attorney User's Guide. (Confirmation #: FLND1678915413264).

7. Mr. Browning agrees to comply with the provisions of the Florida Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of

Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court and understands he shall be subject to the disciplinary jurisdiction of this Court.

8. Mr. Browning certifies that he has never been subject to any suspension or disbarment proceedings.

9. Mr. Browning has an active, upgraded PACER account. He requests authorization to receive electronic notices of filing. His email address is jackbrowning@dwt.com.

10. Mr. Browning is paying the required \$208.00 *pro hac vice* fee for this case at the time of filing.

WHEREFORE, Defendants respectfully requests that this Court enter an order granting this motion and permitting Mr. Browning to appear *pro hac vice* in this case.

/s/ John M. Browning
JOHN M. BROWNING
New York Bar No. 5213038
Davis Wright Tremaine LLP
1251 Avenue of the Americas, 21st Fl.
New York, New York 10020
(212) 489-8230
jackbrowning@dwt.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2023, I electronically filed the forgoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ John M. Browning
JOHN M. BROWNING
New York Bar No. 5213038
Davis Wright Tremaine LLP
1251 Avenue of the Americas, 21st Fl.
New York, New York 10020
(212) 489-8230
jackbrowning@dwt.com

Attorney for Defendants